

# EXHIBIT A

**MOTIONS FOR WHICH DEFENDANTS REQUEST ORAL ARGUMENT<sup>1</sup>****I. Summary Judgment Motions**

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>2984</b>	<ul style="list-style-type: none"> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• TDA</li> <li>• Thomson</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Costco</li> <li>• Electrograph</li> <li>• Interbond</li> <li>• Office Depot</li> <li>• P.C. Richard, et. al.</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• Tweeter</li> </ul>	Notice of Motion and Motion for Summary Judgment (on liability, <i>Illinois Brick</i> , due process, and statute of limitations)	Yes	3253	3430	<p>This motion concerns the absence of evidence of liability as to TDA</p> <p>The opposition is limited to TDA's Sherman Act claims; Plaintiffs do not oppose TDA's motion as it relates to their state-law claims.</p> <p>LG by joinder (Joinder, ECF No. 3864; DAPs' Opposition, ECF No. 3883)</p> <p>Mitsubishi Electric by joinder (Joinder, ECF No. 3898; DAPs' Opposition, ECF No. 3916)</p> <p>Thomson by joinder (Joinder, ECF No. 3888; DAPs' Opposition, ECF No. 3897)</p>

<sup>1</sup> Defendants will also present argument on any additional motions for which argument will be helpful to the Court. As noted in the Case Management Conference statement filed concurrently, Defendants request that the Court set a date or dates in January 2016 for argument on the summary judgment motions designated herein (and on DAP MIL No. 11, for the reasons explained in note 2, *infra*). Defendants also request that the Court set a date for argument on the remaining designated motions *in limine* and motions to exclude expert testimony. Defendants will be prepared to propose a schedule for these arguments at the December 15, 2015 argument.

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>3006</b>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Philips</li> <li>• Samsung SDI</li> <li>• TDA</li> <li>• Thomson</li> <li>• Toshiba</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Costco</li> <li>• Interbond</li> <li>• Office Depot</li> </ul>	Motion for Partial Summary Judgment on Plaintiffs' Indirect Purchaser Claims Based on Foreign Sales	As to Best Buy only	3287	3452	<p>LG by unopposed joinder (as noted in LG's Motion for Partial Summary Judgment on FTAIA Grounds, ECF No. 3032)</p> <p>The Court previously dismissed certain claims previously at issue in this motion, including the state law indirect claims of Tech Data ECF No. 2433); Costco (ECF No. 3181, 2262); Sears (ECF No. 3394); Electrograph, CompuCom, P.C. Richard, et. al. and Tweeter (ECF No. 3226).</p>
<b>3008</b>	<ul style="list-style-type: none"> <li>• CPT (as to Best Buy and ViewSonic only)</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Philips</li> <li>• Samsung SDI</li> <li>• TDA</li> <li>• Thomson</li> <li>• Toshiba</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• CompuCom</li> <li>• Costco</li> <li>• Dell</li> <li>• Electrograph</li> <li>• Interbond</li> <li>• Office Depot</li> <li>• P.C. Richard, et. al.</li> <li>• Sears/Kmart</li> <li>• Tech Data</li> <li>• Tweeter</li> <li>• ViewSonic</li> </ul>	Motion for Summary Judgment Based Upon Plaintiffs' Failure to Distinguish Between Actionable and Non-Actionable Damages Under the FTAIA	Yes	3272	3442	<p>LG by unopposed joinder (as noted in LG's Motion for Partial Summary Judgment on FTAIA Grounds, ECF No. 3032)</p>

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>3014</b>	<ul style="list-style-type: none"> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Philips</li> <li>• Samsung SDI</li> <li>• Thomson</li> <li>• Toshiba</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Costco</li> <li>• Interbond</li> <li>• Sears/Kmart</li> </ul>	Motion for Partial Summary Judgment with Respect to DAPs' Alleged Direct Damage Claims Based on Purchases from Sanyo	Yes	3275	3425	
<b>3032</b>	<ul style="list-style-type: none"> <li>• LG</li> <li>• Mitsubishi Electric</li> </ul>	<ul style="list-style-type: none"> <li>• Sears/Kmart</li> <li>• Tech Data</li> <li>• Tweeter</li> <li>• ViewSonic</li> <li>• Best Buy</li> <li>• Circuit City</li> <li>• CompuCom</li> <li>• Costco</li> <li>• Dell</li> <li>• Electrograph</li> <li>• Interbond</li> <li>• Office Depot</li> <li>• P.C. Richard, et. al.</li> </ul>	Motion for Partial Summary Judgment on FTAIA Grounds	Yes	3272-3	3443	Mitsubishi Electric by joinder (Joinder, ECF No. 3898; DAPs' Opposition, ECF No. 3916)

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>3037</b>	<ul style="list-style-type: none"> <li>• Mitsubishi Electric</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Costco</li> <li>• Electrograph</li> <li>• Interbond</li> <li>• Office Depot</li> <li>• P.C. Richard, et al.</li> <li>• Sears/Kmart</li> <li>• Tech Data</li> <li>• Tweeter</li> </ul>	Motion for Summary Judgment Based Upon Absence of Liability	Yes	3271	3462	
<b>3102</b>	<ul style="list-style-type: none"> <li>• Chunghwa</li> </ul>	<ul style="list-style-type: none"> <li>• ViewSonic</li> </ul>	Motion for Partial Summary Judgment for Lack of Standing as to ViewSonic Corporation	Yes	3263	3476	

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>3108</b>	• CPT	• ViewSonic	Motion for Summary Judgment Based Upon Failure to Provide Evidence to Avoid FTAIA Bar on Foreign Commerce	Yes	3249	3477	The Court dismissed ViewSonic's complaint without prejudice as to Panasonic, PNA, and MTPD (ECF No. 3215).

**II. Motions to Exclude Certain Expert Testimony**

<b>Dkt No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Relevant to N.D. Cal. Trial</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>3174</b>	• All Defendants	• All DAPs	Defendants' Joint Motion to Exclude Certain Expert Testimony of Professor Kenneth Elzinga	Yes	3404	3522	

**III. Motions *In Limine***

<b>(1) DAPs' Omnibus Motions In Limine (Dkt. No. 3558)</b>						
<b>Motion No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>1</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude Evidence or Argument regarding Plaintiffs' Competitive Intelligence Practices	3676-4	3757-4	
<b>2</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude Evidence or Argument regarding Downstream Pass-Through	3676-4	3757-4	
<b>4</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> <li>•</li> </ul>	Motion to Exclude Evidence or Argument regarding Plaintiffs' Purported "Market Power"	3676-4	3757-4	

<i>(1) DAPs' Omnibus Motions In Limine (Dkt. No. 3558)</i>						
<b>6</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude Evidence or Argument regarding Other Actions and Settlements in this MDL	3676-4	3757-4	
<b>7</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude Argument That Plaintiffs' Claims are Barred Because They Arise from Foreign Commerce	3676-4	3757-4, 3768	

<i>(1) DAPs' Omnibus Motions In Limine (Dkt. No. 3558)</i>						
<b>10</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude Evidence or Argument regarding Incomplete Pass-Through of Overcharges through Affiliate Entities	3676-4	3757-4	
<b>11<sup>2</sup></b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Establish the Preclusive Effect of, or in the Alternative Admit, the Decision of the European Commission	3676-4, 3788, 3789	3757-4; 3813	
<b>14</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Exclude References to and Evidence of Defendants' Non-Indictment	3676-4	3757-4	

<sup>2</sup> Although the DAPs filed DAP MIL No. 11 as a motion in limine, DAPs' motion is effectively a summary judgment motion because DAPS seek judgment as a matter of law in that motion on all dispositive issues (other than damages) against numerous Defendants in this case based on the purported preclusive effect of the Decision of the European Commission. In light of the importance of DAP MIL No. 11 and because DAPs should have filed it as a summary judgment motion, Defendants respectfully request oral argument on this MIL in January 2016, at the same time as the summary judgment motions marked above.

<i>(1) DAPs' Omnibus Motions In Limine (Dkt. No. 3558)</i>						
<b>15</b>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	Motion to Admit Testimony of Summary Witness	3676-4, 3671, 3677	3757-4	

<i>(2) Defendants' Joint Motions In Limine</i>							
<b>Motion No.</b>	<b>Dkt. No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>2</b>	3583	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude Evidence or Testimony Pertaining to Foreign Antitrust Investigations	3787	3814	
<b>3</b>	3556	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude All Evidence and Reference at Trial to the U.S. Department of Justice's Criminal Investigation of the Cathode Ray Tube Industry	3665, 3687	3764	
<b>4</b>	3572	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude LCD and Other Non-CRT Product Conspiracies	3640	3760	<p>Toshiba by unopposed joinder (Joinder, ECF No. 3692)</p> <p>Thomson and Mitsubishi only joined in Section II of this motion.</p>
<b>5</b>	3589	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude Plea by Samsung SDI Company, Ltd as to Non-Pleading Defendants or, Alternatively, to Provide A Limiting Instruction	3643-4	3763	

MDL No. 1917

<i>(2) Defendants' Joint Motions In Limine</i>							
<b>Motion No.</b>	<b>Dkt. No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>7</b>	3578	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude Dr. Frankel's Inflation Adjusted Damages	3641	3751	
<b>8</b>	3563-3	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude Evidence and Argument Relating to Damages From Spillover or Ripple Effects of Foreign Price-Fixing Activities on U.S. Prices	3658; 3678-3	3754-4	
<b>9</b>	3591	<ul style="list-style-type: none"> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Sharp</li> </ul>	Motion to Exclude Certain Expert Testimony of Jerry A. Hausman	3701-3	3755	
<b>12</b>	3568	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Exclude Plaintiffs' Price Ladder Theory of Recovery	3648-4	3761	

<i>(2) Defendants' Joint Motions In Limine</i>							
<b>Motion No.</b>	<b>Dkt. No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
<b>13</b>	3579	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Allow Full Defense Examination of Common Witnesses During Plaintiffs' Case-In-Chief and Limit Use of Deposition Testimony	3662	3758	
<b>15</b>	3593	<ul style="list-style-type: none"> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Sharp</li> </ul>	Motion to Exclude Evidence Related to a Violation of the Antitrust Laws Under a Rule of Reason Analysis	3701-3	3750	
<b>16</b>	3597	<ul style="list-style-type: none"> <li>• CPT</li> <li>• LG</li> <li>• Mitsubishi Electric</li> <li>• MTPD</li> <li>• Panasonic</li> <li>• Thomson</li> <li>• Toshiba</li> <li>• TDA</li> </ul>	<ul style="list-style-type: none"> <li>• Best Buy</li> <li>• Circuit City</li> <li>• Sears/Kmart</li> <li>• Sharp</li> <li>• ViewSonic</li> </ul>	Motion to Permit Evidence and Argument Regarding Upstream Pass-on and Plaintiffs' Bargaining Power	3654; 3666	3770	

<i>(3) Individual Defendants' Motions In Limine</i>							
<b>Motion No.</b>	<b>Dkt. No.</b>	<b>Moving Parties</b>	<b>Adverse Parties</b>	<b>Title of Motion</b>	<b>Opp'n ECF No.</b>	<b>Reply ECF No.</b>	<b>Related Filings and Notes</b>
N/A	3526	• Chunghwa	• Best Buy • ViewSonic	Defendants Chunghwa Picture Tubes, Ltd and Chunghwa Picture Tubes (Malaysia) SDN. Bhd.'s Motion in Limine to Exclude Opinions or Calculations Regarding Actual Damages Attributable to the Chunghwa Defendants	3698-4	3744-4	
N/A	3598	• Mitsubishi Electric	• DAPs	Mitsubishi Electric's Motion in Limine No. 1 to Exclude the SDI Interrogatory Response	3644	3774	